

Speedypin Prepaid, LLC  
480 N. Magnolia Drive  
El Cajon, CA 92020

February 27, 2009

**Via Electronic Submission (ECFS)**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 – 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Annual CPNI Certification Filing of  
Speedypin Prepaid, LLC (Filer ID 827523)  
EB Docket No. 06-36


Dear Ms. Dortch:

Attached hereto please find a CPNI Certification filing of Speedypin Prepaid, LLC ("Speedypin" or the "Company") in EB Docket No. 06-36. As required by FCC Rules, in anticipation of commencement of service, Speedypin has registering with USAC and the FCC on Form 499-A; Speedypin has also sought – and been granted -- authority pursuant to Section 214 of the FCC's rules to provide international telecommunications services (File No. ITC-214-20090012-00013, granted January 30, 2009). The Company did not, however, provide any telecommunications services during calendar year 2008, the period covered by the annual CPNI certification due no later than Monday, March 2, 2009. Indeed, Speedypin was not an entity subject to the FCC's jurisdiction until after the close of the reporting period.

Out of an abundance of caution, however, Speedypin submits the attached CPNI certification in which the Company makes clear that it provided no telecommunications services during the reporting period, had no access to CPNI and made use of no CPNI in any fashion during the reporting period.

To the extent you have any questions concerning this submission, please do not hesitate to contact me.

Sincerely,



Larry Salzman, Managing Member

**EB Docket 06-36**

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008

Date Filed: February 27, 2009

Name of Companies Covered by this Certification: Speedypin Prepaid, LLC

Form 499 Filer ID: 827523

Name of Signatory: Larry Salzman

Title of Signatory: Managing Member

I, Larry Salzman, certify that I am an officer of the company named above and, acting as an agent of the company, I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that it is in compliance with the requirements set forth in § 64.2001 *et seq.* of the Commission's rules.

The company has taken no actions (instituted a proceeding or filed a petition at either a state commission, a court or the Commission) against data brokers in the past year. The company does not possess any information to report with respect to the processes pretexters are using to attempt to access CPNI.

The company has received any customer complaints in the past year concerning the unauthorized use of CPNI.

The steps the company has taken to protect CPNI are set forth in the statement accompanying this certification.

Signed: \_\_\_\_\_

Larry Salzman, Managing Member

**Speedypin Prepaid, LLC**  
**Statement of CPNI Procedures and Compliance**

Speedypin Prepaid, LLC, provided no telecommunications services during calendar year 2008 and therefore is not subject to the annual CPNI certification filing obligation for that period.<sup>1</sup> Indeed, the Company has not yet rolled out its service offering in 2009.

Furthermore, when the Company does initiate the provision of services, it will do so on an exclusively prepaid basis. As a provider of prepaid calling services which will be offered predominantly to a transient public at retail outlets and kiosks, Speedypin will not be privy to customer information such as name, address and other personal information because such information is not gathered at the point-of-sale. Rather, the Company's access to CPNI will be generally limited to Call Detail Records (CDRs) and/or other data collected by its switches (if any). CDR data is not associated with individual customer account information, but rather with unique PINs (personal identification numbers).

Nevertheless, Speedypin will ensure that its business methods and operating procedures are in compliance with FCC Rules.

Speedypin will ensure that no data or information, CPNI or otherwise, regarding customers is ever sold to or provided to any third parties for any purpose, except as the Company may be required to do so by operation of law, such as pursuant to lawful subpoena.

Prior to the initiation of service, Speedypin will train its employees regarding the appropriate use of CPNI; the Company has already instituted disciplinary procedures which will be applicable in the event an employee violates the Company's policies.

The Company's internal network and onsite and offsite data are maintained securely through technology and other methods. All customer information is therefore protected from "hacking" and other forms of misappropriation.

Speedypin will continue to review and refine its CPNI policies and procedures as appropriate to ensure employee compliance with CPNI rules and regulations and the continued protection of CPNI for the benefit of its customers and authorized users.

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<sup>1</sup> Although the instant certification is not mandated by FCC rules, Speedypin provides the information set forth herein on a voluntary, and purely informational, basis.